

AMERICAN BOTTOMS
REGIONAL WASTEWATER TREATMENT FACILITY

1 AMERICAN BOTTOMS ROAD
SAUGET, ILLINOIS 62201

(618) 337-1710
FAX (618) 337-8919

X.C. PT
JDB
JWS
REC
E.T.C.
11/6/90
153586
ENCLOSURE

November 6, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P117029517

Mr. Paul Tandler
Vice President
Cerro Copper Products
P. O. Box 66800
St. Louis, MO 63166-6800

Dear Mr. Tandler:

Your application for issuance of a Discharge Permit has been reviewed and processed in accordance with the Village of Sauget Ordinance No. 567.

The enclosed issued permit No. 108 covers the wastewater discharge from the facility located in Sauget, Illinois. All discharges from this facility and related actions and reports shall be in accordance with the terms and conditions of this permit and the Ordinance.

This permit has been issued to conform with the Consent Decree which was entered into between USEPA and Cerro Copper Products. This permit supercedes the permit issued June 15, 1990.

If you wish to appeal any effluent limitations, pretreatment requirements, or conditions imposed in this wastewater discharge permit, a written notice of appeal should be filed within 30 days after the effective date of the permit. Your written notice of appeal, if filed, should be mailed or delivered to:

Village Clerk
Village of Sauget
2897 Falling Springs Road
Sauget, Illinois 62206

Very truly yours,

VILLAGE OF SAUGET

By: 
George R. Schillinger
General Manager

GRS:am
Enclosure

C05138

VILLAGE OF SAUGET
AMERICAN BOTTOMS REGIONAL WASTEWATER DISCHARGE PERMIT

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(A Revised Drawing is being prepared.)	

VILLAGE OF SAUGET

AMERICAN BOTTOMS REGIONAL WASTEWATER DISCHARGE PERMIT

Permit No. 108

In accordance with all terms and conditions of Ordinance 567 of the Village of Sauget; the 1977 Regional Agreement as amended; Section 46 of the Illinois Environmental Protection Act of 1970 (Ill. Rev. Stat. 1987, Ch. 1111/2, Sec. 1046) as amended; and Ill. Rev. Stat. 1987, Ch. 24, Sec. 11-141-7; permission is hereby granted to:

Cerro Copper Products Co.
(name of industry)

Highway 3 and A&S Tracks
(address)

Sauget, Illinois 62202

Classified Standard Identification Code (SIC) No. 3341, 3351

Subject to the National Categorical Pretreatment Standard (NCPS) No. _____

40 CFR: 421.65; 464.25 B,F; 468.14 A,D,K,M,Q
to discharge industrial wastewater into sewer lines tributary to the American Bottoms Regional Wastewater Treatment Plant.

This permit is granted in accordance with the application filed on the 28th day of the month of February, in the year of 1990 in the office of the Regional Plant Manager, #1 American Bottoms Road, Sauget, Illinois 62201, and in conformity with plans, specifications and other data submitted in support of the above application, all of which are filed with and considered as a part of this permit, together with the attached conditions and requirements.

Nothing herein shall be construed as a permit or is permission for the permittee to violate the provisions of any sewer use ordinance in effect within the jurisdiction of any unit of local government in which the permittee's facility is located.

Effective this 1st day of September, 1990

To expire the 1st day of September, 1990

VILLAGE OF SAUGET

By: 
General Manager

PART 1 - GENERAL CONDITIONS OF PERMIT

1. General - This Wastewater Discharge Permit shall be expressly subject to all provisions of Ordinance 567 of the Village of Sauget and all other applicable regulations, user charges, and fees established by the Village of Sauget. In consideration of the granting of this permit and compliance with the Ordinance, the permittee shall comply with all provisions of the Ordinance, permit conditions, and the Standard Operating Procedures including but not limited to the specific requirements of these General Condition Articles.
2. Prohibitive Standards - The permittee shall comply with all prohibitive discharge standards pursuant to Paragraph 3.2 of the Ordinance and all Local, State, and Federal discharge limits as outlined in the Permit.
3. Monitoring Facilities - The permittee shall install and operate monitoring facilities and afford the POTW access thereto; pursuant to Paragraph 4.5 of the Ordinance.
4. Inspection of Facilities and Records - The permittee shall allow the POTW or its representatives ready access upon presentation of credentials at reasonable times to all parts of its premises in which a discharge source or treatment system is located or in which records required by this Ordinance are kept for the purposes of inspection, sampling, examination and photocopying of said records and for the performance of any of their duties; pursuant to Paragraph 4.6.1 of the Ordinance.
5. Retention of Records - The permittee shall retain for a minimum of three years any records of monitoring activities and results relating to wastewater discharge and for affording the POTW access to said records; pursuant to Paragraphs 4.6.3, 4.6.4 of the Ordinance.
6. Change in Conditions - The permittee shall provide advance notification to the POTW of any material and substantial change in the type, quality, or volume of the wastewater constituents being introduced into the wastewater treatment system; pursuant to Paragraph 4.2.6 of the Ordinance.
7. Prohibition of Improper Dilution - Improper dilution shall be prohibited pursuant to Paragraph 3.8 of the Ordinance.
8. Spill Containment and Unlawful Discharge - Spill Containment procedures and notification of slug, accidental and/or deliberate discharges shall be required pursuant to Paragraph 3.9 of the Ordinance.

9. Transfer - Wastewater Discharge Permits are issued to a specific Significant Industrial User for the process activity specified in the permit. A Wastewater Discharge permit shall not be assigned, transferred or sold to a new owner or new user in different premises or to a new or changed operation in the same or different premises without the approval of the Village of Sauget; pursuant to Paragraph 4.2.9 of the Ordinance.
10. Permit Modifications - The terms and conditions of this permit may be subject to modifications by the Village of Sauget during the term of this permit; pursuant to Section 4.2.8 of the Ordinance.
11. Pretreatment - The permittee shall comply with all necessary pretreatment requirements pursuant to Paragraph 3.7 of the Ordinance.
12. Additional Information - The permittee shall furnish any additional information as may be reasonably requested by the Village of Sauget from time to time.

PART 2 - GENERAL REPORTING REQUIREMENTS

1. General - The General Pretreatment Regulations of 40 CFR 403.12 and Ordinance 567 have set forth basic reporting requirements that apply to Significant Industrial Users (SIUs). Reporting requirements include the following General Reporting Requirements.
2. Periodic Compliance Report - The permittee shall submit to the Village of Sauget during the months of June and December for the preceding two calendar quarters unless required more frequently in the Pretreatment Standard or by the POTW or IEPA, a certified report indicating the nature and concentration of pollutants in the effluent which are limited by such applicable Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period. The requirements of this reporting are described in Paragraph 4.4.3 of the Ordinance and the Standard Operating Procedures, Part III, Paragraph 3.4.3.
3. Incremental Compliance Report - This report is required should the Baseline Monitoring Report (if applicable) or the Periodic Compliance Report reflect that the Significant Industrial User is not in compliance with its pretreatment standards and/or its compliance schedule. The requirements for this report are described in the Standard Operating Procedures, Part III, Paragraph 3.4.4 and Paragraph 4.4.2.
4. Notice of Unlawful Discharge - Except for those discharges which are the subject of the monthly compliance reporting requirement in Part 4, Section B, the permittee shall submit to the Village of Sauget an oral report detailing any unlawful discharge and a follow-up written report

as described in Paragraph 3.9 of the Ordinance and Part III, Paragraph 3.4.6 of the Standard Operating Procedures.

5. Monitoring Reports - Monitoring results obtained shall be summarized and reported consistent with the sampling frequencies included herein. The report shall indicate the nature and concentration of all pollutants in the wastewater discharges which are regulated by the standards set forth in this Permit and include measured maximum and average daily flows. The report is due on or before the 45 days after the end of the required bimonthly reporting period. If laboratory analysis results are not received before the twenty-fifth day of the succeeding month, the permittee may request an extension for report submittal.
6. Report Submittal - All reports required by this Permit shall be submitted in triplicate to:

Village of Sauget
c/o American Bottoms Regional Wastewater Treatment Facility
#1 American Bottoms Road
Sauget, Illinois 62201
Attn: Pretreatment Coordinator

PART 3 - SAMPLING AND TESTING REQUIREMENTS

Section 1 - General

- A. All Significant Industrial Users (SIUs) are responsible for compliance sampling. The monitoring facilities designated by this permit are shown on Figure 1.

Compliance sampling addresses the sampling and testing requirements to demonstrate continued compliance with pretreatment standards. Compliance sampling relates to pollutants for which local, state, and national categorical limits exist, and any other parameters identified by the Village of Sauget in this permit.

- B. Compliance monitoring results and frequencies shall be reviewed annually by the Village of Sauget and appropriate adjustments made to frequencies and parameters in an updated Wastewater Discharge Permit. Pollutants and frequencies for compliance sampling are cited hereafter.
- C. All handling and preservation of collected samples and laboratory analyses shall be performed in accordance with procedures contained in 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. Composite sampling, where called for, shall be performed over a twenty-four (24) hour period by flow or time proportionate methods.

The test procedures for all samples shall conform to one of the approved test methods which provides the most sensitive detection limits for the pollutant under investigation listed in the current issue of the Code of Federal Regulations, and the most recent addendum published by the Federal Register. The testing for priority organic pollutants shall be conducted utilizing gas chromatograph/mass spectrometer (GC/MS) methods and procedures. For Volatile Organic Compounds, Phenols, Oil and Grease, and pH, at least one (1) grab sample shall be collected in the same twenty-four (24) hour period as the composite sampling is performed. Other procedures may be exercised, pursuant to Section 4.6.2 of the Ordinance.

- D. The appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.
- E. For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain and submit records which include:
 - 1. The date, exact place, method and time of sampling;
 - 2. The names of the person or persons taking the samples;
 - 3. The dates analyses were performed;
 - 4. Who performed the analyses;
 - 5. The analytical techniques/methods used; and
 - 6. The results of such analyses.
 - 7. The average daily and maximum daily flows.

A. Effluent Discharge Limits

1. Local Limits: The Village of Sauget reserves the right, by Ordinance 567, to establish limitations or requirements on discharges to the wastewater disposal system if deemed necessary to comply with the objectives presented in Section 1.1 of the Ordinance.

<u>Parameter</u>	<u>Limitations</u>
N.A.	

2. State Limits: These limits are stated in 35 Ill. Adm. Code Part 307. This Part 307 places restrictions on the types, concentrations, and quantities of contaminants which can be discharged into sewer systems in the State.

<u>Parameter</u>	<u>Limitations</u>
Mercury	0.0005 (mg/L) (Max. Month Avg.)
Cyanide (Total)	10.0 (mg/L) ¹ (Max. Grab)

3. National Categorical Pretreatment Standards (NCPS): NCPS are standards published by USEPA and contain numerical limits for the discharge of pollutants from specified industrial categories. These categorical standards have been or will be developed for industrial categories determined to be the most significant sources of pollutants. Alternate limits are based on calculations and supporting data submitted by the Industrial User for use of the combined wastestream formula of 40 CFR Section 403.6(e). As indicated by the Industrial User, the alternate limits will be enforced by compliance sampling and other provisions of this permit. Your operations are subject to the following limits:

¹ Provided any sample tested shall not release more than 2 mg/L of cyanide when tested at a pH of 4.5 and at a temperature of 66 C (150 F) for a period of 30 minutes.

<u>NCPS</u>	<u>Parameter</u>	<u>Limitations</u>	
		<u>1-Day Max.</u>	<u>Max Month Avg.</u>
421.65	No discharge of process wastewater pollutants		
464.25 B ¹	Copper (T)	0.928	0.506
	Lead (T)	0.639	0.314
	Zinc (T)	0.916	0.350
464.25 F ²	Copper (T)	1.81	0.988
	Lead (T)	1.25	0.612
	Zinc (T)	1.79	0.673
	Total Phenols	2.02	0.706
	TTO ³	5.41	1.77
	Oil & Grease	70.6	23.5
468.14 A ^{4,5}	Cr	0.045	0.018
	Cu	0.195	0.103
	Pb	0.015	0.013
	Ni	0.197	0.130
	Zn	0.150	0.062
	TTO ³	0.066	0.035
	Oil & Grease	2.060	1.236
468.14 D ^{4,5}	Cr	0.284	0.116
	Cu	1.227	0.646
	Pb	0.096	0.083
	Ni	1.240	0.820
	Zn	0.943	0.394
	TTO ³	0.419	0.219
	Oil & Grease	12.920	7.752

¹ Units are lb. per 10⁶ lb. of metal poured.

² Units are pounds per billion SCF of air scrubbed.

³ The TTO standard is based on the application of oil and grease removal, thus if oil and grease is monitored at the given level, compliance with TTO is ensured. Oil and grease is an alternative limit for TTOS.

⁴ mg/off-kg (mg/off-lb) of copper or copper alloy formed and removed from one process for transfer to another process.

⁵ Compliance with the monthly discharge limit is required regardless of the number of samples analyzed and averaged.

<u>NCPS</u>	<u>Parameter</u>	<u>Limitations</u>	
		<u>1-Day Max.</u>	<u>Max Month Avg.</u>
468.14 K ^{4,5}	Cr	0.574	0.235
	Cu	2.481	1.306
	Pb	0.195	0.169
	Ni	2.507	1.658
	Zn	1.906	0.796
	TT0 ³	0.848	0.444
	Oil & Grease	26.120	15.672
468.14 M ^{4,5}	Cr	0.051	0.020
	Cu	0.220	0.116
	Pb	0.017	0.015
	Ni	0.222	0.147
	Zn	0.169	0.070
	TT0 ³	0.075	0.039
	Oil & Grease	2.320	1.392
468.14 Q ^{4,5}	Cr	0.009	0.003
	Cu	0.041	0.021
	Pb	0.003	0.002
	Ni	0.041	0.027
	Zn	0.031	0.013
	TT0 ³	0.014	0.007
	Oil & Grease	0.436	0.261

³ The TTO standard is based on the application of oil and grease removal, thus if oil and grease is monitored at the given level, compliance with TTO is ensured. Oil and grease is an alternate limit for TTOs.

⁴ mg/off-kg (mg/off-lb) of copper or copper alloy formed and removed from one process for transfer to another process.

⁵ Compliance with the monthly discharge limit is required regardless of the number of samples analyzed and averaged.

B. Monitoring Requirements

Copper Forming Limits for Main Tube Mill (Sampling Location 50):

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	1.395	0.734
Chromium	0.330	0.131
Lead	0.109	0.093
Nickel	1.409	0.932
Zinc	1.071	0.447
Total Toxic Organics ¹	0.476	0.249
Oil and Grease	14.692	8.814

Compliance with the above limits will be determined by measurement of pollutant discharge at Sampling Location 50.

Copper Forming Limits for the Piercing Mill, Building 80 (Sampling Location 40):

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	0.338	0.178
Chromium	0.078	0.032
Lead	0.026	0.023
Nickel	0.341	0.226
Zinc	0.259	0.108
Total Toxic Organics ¹	0.115	0.060
Oil and Grease	3.558	2.134

Compliance with the above limits will be determined by measurements of pollutant discharge at Sampling Location 40.

Secondary Copper Limits (Sampling Location 60):

As of March 1, 1991, Cerro shall not discharge any process wastewater pollutants from any operations subject to 40 C.F.R. Part 421 and shall comply by recycling and reusing all wastewater flows that are subject to 40 C.F.R. Part 421, except such wastewater may be transferred to the Metal Molding and Casting ("MMC") portion of the facility in accordance with the paragraphs below.

¹ As an alternative to monitoring for TTO, Cerro may elect to monitor for Oil and Grease. Complying with the Oil and Grease limit shall be the equivalent of complying with the TTO limit.

Cerro may transfer process wastewater containing pollutants from the anode furnace air pollution control scrubber to the MMC portion of the facility only if all of the following conditions are met:

- a. Cerro shall not transfer more than a monthly average of 10,000 gallons per day of anode furnace air pollution control scrubber wastewater for use as make-up water in the MMC portion of the Cerro facility. Cerro shall manage all wastewater transferred from the anode furnace air pollution control scrubber as wastewater regulated by the National Categorical Pretreatment Standard which applies to the MMC portion of the facility.
- b. Cerro shall not transfer any anode furnace air pollution control scrubber wastewater to the MMC portion of the facility unless it complies with the following limits:

<u>Pollutant</u>	<u>Limit (monthly average)¹</u>
Copper	2 mg/l
Cadmium	2 mg/l
Lead	2 mg/l
Zinc	6 mg/l

- c. Cerro shall reuse (e.g., through sale to a reclaimer) or recycle, on or off-site, all solid residuals or sludge generated from the MMC wastewater treatment portion of the facility, but in no event shall Cerro land dispose any such solid residuals or sludge generated from the MMC portion of the facility.

Compliance with this limit will be determined by measurement of pollutant discharge at Sampling Location 60.

¹ For purposes of this permit, "monthly average is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Metal Molding and Casting Limits for Building 19 WWTF (Sampling Location 30):

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	1.513	0.825
Lead	1.043	0.512
Zinc	1.495	0.570
Total Toxic Organics	0.225	0.074
Oil and Grease ¹	2.937	0.978
Phenols (4AAP)	0.085	0.029

If Cerro discharges batches of wastewater which represent more than one day of operation, then the applicable limit for such discharge shall be multiplied by the number of days (calculated per quarter day) of production which generated the wastewater. Regardless of the number of days of production, Cerro must comply with the monthly average limitations set forth above without any adjustment.

Compliance with the above limits will be determined by measurement of pollutant discharges at Sampling Location 30.

State Limitations at East and West Outfalls:

<u>Pollutant</u>	Daily Max. Limit <u>mg/l</u>	Monthly Avg. Limit <u>mg/l</u>	Max. Grab <u>mg/l</u>
Cyanide ²	--	--	10.0
Mercury	0.001	0.0005	0.0025

¹ As an alternative to monitoring for TTO, Cerro may elect to monitor for Oil & Grease. Complying with the Oil & Grease limit shall be equivalent of complying with the TTO limit.

² Provided any sample tested shall not release more than 2 mg/L of cyanide when tested at a pH of 4.5 and at a temperature of 66 C (150 F) for a period of 30 minutes.

C. Monitoring Schedule

Cerro shall perform the monitoring, sampling analysis and reporting required by 40 C.F.R. 403.12(e) every other month at the location, frequency and methods described in table below and samples shall be representative of daily operations.

Parameter	Units			Sample Type (a)			Location(b)/Frequency					
	gal	mg/l	lbs/d	Meter	Composite	Grab	WOF	EOF	30(d)	40	50	60
Flow	X			X			D	D	W	W	W	CON
Mercury		X			X							2SP
Copper		X			X							2SP
Cadmium		X			X							2SP
Lead		X			X							2SP
Zinc			X		X							2SP
Copper			X		X				2SP	2SP	2SP	
Chromium			X		X					2SP	2SP	
Lead			X		X				2SP	2SP	2SP	
Nickel			X		X					2SP	2SP	
Zinc			X		X				2SP	2SP	2SP	
TTO(Volatiles)			X			X			2SP	2SP	2SP	
TTO(BN/AE)			X		X				2SP	2SP	2SP	
Oil & Grease(c)			X			X			2SP	2SP	2SP	
Phenol			X			X			2SP			
Mercury		X			X		M	M				
Cyanide		X				X	M	M				

D = Daily flow recording based on totalized flow measurements.

W = Weekly flow recording based on totalized flow measurements.

M = Monthly Samples

2SP = 2 samples taken during a sampling period (SP) in separate weeks.

CON = Continuous flow monitoring in the form of daily totalization.

Sampling Periods = November-December, January-February, March-April, May-June, July-August, September-October.

Notes:

- a. (1) Composite sample is a 24-hour flow proportional composite sample as defined in 40 C.F.R. 403 Appendix E (I).
- (2) Grab Sample is an individual sample collected over a period of time not to exceeding 15 minutes and a minimum of 4 grab samples per parameter to characterize a parameter over a 24 hour sampling period. The method is described in 40 C.F.R. 403 Appendix E (II).
- b. WOF - West Outfall
 EOF - East Outfall
 Location 30 - Metal Molding & Casting (Bldg. 19 WWTF)
 Location 40 - Copper Forming (Piercing Mill)
 Location 50 - Main Tube Mill
 Location 60 - Anode Scrubber Transfer
- c. As an alternative to monitoring for TTO, Cerro may elect to monitor for Oil & Grease. Complying with the Oil & Grease limit shall be considered the equivalent of complying with the TTO limit.
- d. All parameters regulated at Sample Location 30 shall be analyzed from a grab sample during batch discharges.

PART 4 - COMPLIANCE SCHEDULE

A. General:

Authority Citation: Section 4.2.5, Village of Sauget Pretreatment Ordinance No. 567.

Permit No. 108

Industry Name: Cerro Copper Products Company

B. Partial Compliance Schedule -- Copper Forming:

- a. Piercing Mill (Bldg. 80) - Beginning on September 1, 1990 and within the first ten days of wastewater generating operations conducted at the Piercing Mill, Cerro shall achieve and maintain compliance.
- b. Main Tube Mill - As of October 1, 1990, Cerro shall modify the piping which serves the Main Tube Mill to allow for the collection of samples from all processes regulated by 40 C.F.R. Part 468 to be collected from a single sampling point prior to the discharge of those wastewaters into the existing Cerro sewer system.

C. Compliance Schedule Reporting:

- a. Piercing Mill (Bldg. 80) - Cerro shall submit the report demonstrating initial compliance with Section 2B of this permit within 45 days after a total of 10 days of wastewater generating operations are conducted at the Piercing Mill. For the purposes of the preceding sentence, no wastewater generating operations will be deemed to have occurred prior to September 1, 1990. Cerro shall demonstrate continuing compliance with the limitations and conditions in Section 2B and 2C during the following two-month sampling periods: November-December, January-February, March-April, May-June, July-August and September-October. If Cerro has not operated the Piercing Mill during one calendar week during a given reporting period, this sampling frequency requirement is waived. If Cerro has only operated the Piercing Mill during one calendar week during a given reporting period, this sampling frequency requirement is waived and in lieu of it Cerro shall sample once during the week in which the Piercing Mill was in operation. The demonstration of continuing compliance requirements of this paragraph shall commence no later than the first reporting period following the submission of the report demonstrating initial compliance.
- b. Main Tube Mill - Cerro shall demonstrate continuing compliance with the limitations and conditions in Section 2B and 2C during the following two-month sampling periods: November-December, January-February, March-April, May-June, July-August and September-October. The requirements of this paragraph shall commence no later than November, 1990.

PART 4 - COMPLIANCE SCHEDULE

A. General:

Authority Citation: Section 4.2.5, Village of Sauget Pretreatment Ordinance No. 567.

Permit No. 108

Industry Name: Cerro Copper Products Company

B. Partial Compliance Schedule -- Secondary Copper:

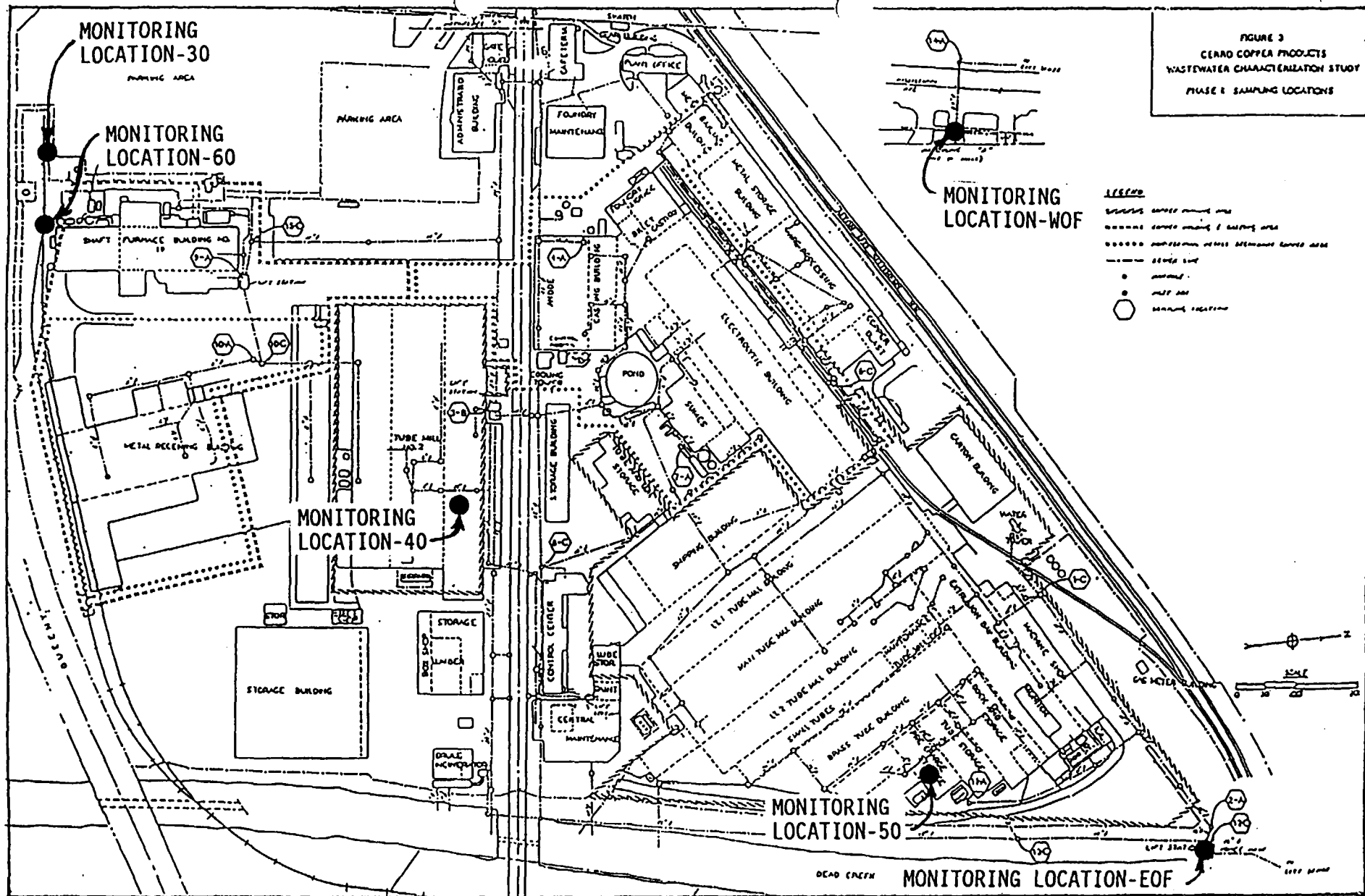
As of March 1, 1991, Cerro shall not discharge any process wastewater pollutants from any operation subject to 40 C.F.R. Part 421 and shall comply by recycling and reusing all wastewater flows that are subject to 40 C.F.R. Part 421, except such wastewater from the Anode Furnace Air Pollution Control Scrubber may be transferred to the Metal Molding and Casting ("MMC") portion of the facility in accordance Section 2B.

- C. Compliance Schedule Reporting: Cerro shall submit the report demonstrating initial compliance with Sections 2B by May 1, 1991. Cerro shall demonstrate continued compliance with the limitations and conditions in Section 2B and 2C as it relates to Secondary Copper during the following two-month sampling periods: November-December, January-February, March-April, May-June, July-August and September-October. The requirements of this paragraph shall commence no later than May 1, 1991.

PART 5 - CONSENT DECREE

As of September 1, 1990, Sections 2B and 2C shall supersede U.S. EPA's Administrative Orders Nos. V-W-86-AO-41, V-W-87-AO-42, and V-W-88-AO-01. As of the date of entry of the Consent Decree attached, the Administrative Orders Nos. V-W-86-AO-41, V-1-87-AO-42, and V-W-88-AO-01 shall terminate.

In the event of any conflict between the compliance, monitoring and reporting provisions of the Consent Decree and of the Permit, the provisions of the Consent Decree shall apply and shall be deemed to be incorporated and made a part of this Permit.



MONITORING LOCATION PLAN
CERRO COPPER PRODUCTS CO.